

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

BIG LOTS, INC., *et al.*

Debtors.<sup>1</sup>

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Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

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**JOINT STIPULATION BY AND AMONG THE DEBTORS AND LIPP CDS, INC.  
RESOLVING MOTION OF LIPP CDS, INC. FOR LEAVE TO FILE PROOF OF CLAIM  
AFTER CLAIMS BAR DEADLINE**

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This joint stipulation (“Stipulation”) is made and entered into by and among (a) debtor Big Lots, Inc., and the other debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), and (b) Lipp CDS, Inc (“Lipp CDS” and, together with the Debtors, the “Parties”). The Parties hereby stipulate and agree as follows:

**RECITALS**

**WHEREAS**, on September 9, 2024 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “Court”);

**WHEREAS**, on May 28, 2025, Lipp CDS, Inc. (“Lipp CDS”) filed the *Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* [D.I. 2808] (the “Motion”). The Motion sought, among other things, entry of an order extending the time by which Lipp CDS

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

may file a proof of claim in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) by thirty (30) days following entry of such order;

**WHEREAS**, the Debtors do not object on timeliness grounds to Lipp CDS’s request in the Motion to file a proof of claim in these Chapter 11 Cases after the January 31, 2025 bar date; and

**WHEREAS**, the Parties have agreed to settle any disputes with respect to the Motion through this Stipulation.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:**

1. The above recitals are incorporated by reference into this Stipulation with the same force and effect as if fully set forth hereinafter.

2. This Stipulation shall be binding on the Parties upon the entry of an order so approving the Stipulation (such order, the “Order” and such approval date, the “Effective Date”).

3. Lipp CDS may file a proof of claim (a “Lipp CDS Proof of Claim”) in the Chapter 11 Cases no later than fourteen (14) days following entry of the Order (such date, the “Extended Bar Date”).

4. Responses or objections to any Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the Extended Bar Date (the “POC Objection Deadline”).

5. Any reply in support of a Lipp CDS Proof of Claim must be filed no later than fourteen (14) days following the POC Objection Deadline.

6. Notwithstanding anything to the contrary herein, the Debtors reserve their rights to contest the allegations raised in a Lipp CDS Proof of Claim on any grounds other than timeliness. Nothing contained herein should be deemed to constitute an admission regarding the validity or allowability of any Lipp CDS Proof of Claim that is timely filed prior to the Extended Bar Date or

any other claim asserted by Lipp CDS in these Chapter 11 Cases.

7. To the extent the Debtors or any other party in interest file an objection to a Lipp CDS Proof of Claim, a hearing on such Lipp CDS Proof of Claim shall be scheduled no earlier than twenty-one (21) days following the date on which such objection is filed, subject to, for the avoidance of doubt, the Court's availability for any such hearing.

8. Each of the Parties to this Stipulation represents and warrants it is duly authorized to enter into and be bound by this Stipulation.

9. This Stipulation may be executed in one or more counterparts and by electronic mail, each of which will be deemed an original but all of which together will constitute one instrument.

10. This Stipulation shall not be modified, altered, amended, or vacated without the written consent of both Parties hereto and order of the Court.

11. The Stipulation is intended by the Parties to be binding upon the Parties' successors, agents, and assigns, including any bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.

12. This Stipulation shall be governed by, and construed in accordance with, the laws of the State of Delaware, except to the extent that the Bankruptcy Code applies.

13. The Parties acknowledge that this Stipulation is the joint work product of all of the Parties, and that, accordingly, in the event of ambiguities in this Stipulation, no inferences shall be drawn against any Party on the basis of authorship of this Stipulation.

14. The Court retains jurisdiction with respect to all matters arising from or related to this Stipulation and the interpretation, implementation, and enforcement thereof, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

**STIPULATED AND AGREED TO THIS 24TH DAY OF JUNE 2025:**

Dated: June 24, 2025  
Wilmington, Delaware

**SUSAN BARILICH, PC**

/s/ Susan Barilich

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*-and-*

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